

February 6, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: EB-06-TC-060, PAETEC Communications, Inc.'s Certification of CPNI Filing (February 6, 2006)

Dear Ms. Dortch:

In accordance with the directive of the Enforcement Bureau ("Bureau") as published in Public Notice, DA 06-223, dated January 30, 2006, enclosed please find the response of PAETEC Communications, Inc. ("PAETEC").

PAETEC's filing includes its annual Customer Proprietary Network Information ("CPNI") compliance certificate as required by Section 64.2009(e) of the Code of Federal Regulations as well as PAETEC's statement of CPNI operating procedures.

If you have any questions, please feel free to contact me at (585) 340-2528.

Sincerely,

1 Ambrosi

Vice President, Carrier & Government Relations

Enclosures

Copies:

Byron McCoy, Telecommunications Consumers Division, Enforcement

Bureau

Best Copy and Printing, Inc. (BCPI)

PAETEC Communications, Inc.

CERTIFICATION OF COMPLIANCE

I, J.T. Ambrosi, hereby certify that I am Vice President, Carrier & Government Relations of PAETEC Communications, Inc. ("PAETEC"), and that I am authorized to execute this certificate on behalf of PAETEC.

I have personal knowledge of the Customer Proprietary Network Information ("CPNI") operating procedures that have been established for PAETEC and such procedures are adequate to ensure compliance with 47 U.S.C. §222 and associated Federal Communication Commission rules.

J.7. Ambrosi

13/06

STATEMENT OF CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI") OPERATING PROCEDURES

Pursuant to 47 C.F.R. Sec. 64.2009, PAETEC has the following procedures in place:

• Implementation of a system where status of customer's CPNI approval can be clearly established prior to the use of CPNI.

PAETEC's customers' are alerted to CPNI rights via execution of standard terms of service prior to service turn up and reminded of rights via bi-annual bill message. PAETEC has selected "opt-out" method. Customers' CPNI desires are noted on PAETEC operational service support field with clear indication of the customers' choice for CPNI.

• Training of personnel as to when they are and are not authorized to use CPNI and presence of a disciplinary process.

PAETEC has educated and trained employees regarding the appropriate use of CPNI. PAETEC's Code of Business Conduct outlines regulatory compliance and the disciplinary consequences for employees in the case of any non-compliance.

Maintenance of a record of sales and marketing campaigns that use customer's CPNI.

PAETEC has records of all sales and marketing campaigns that use any customer's CPNI.

 Maintenance of records of all instances where CPNI was disclosed to third parties or where third parties were allowed access to CPNI, including a description of the campaign, the specific CPNI used in the campaign, and products and services offered as part of the campaign.

PAETEC does not disclose CPNI to third parties.

• Records must be maintained for a minimum of one year.

PAETEC has a Record Retention Policy that includes maintaining records for a minimum of one year.

STATEMENT OF CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI") OPERATING PROCEDURES (con't)

• Must establish a supervisory review process for compliance with rules for outbound marketing situations. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval. The record of this must be maintained for a minimum of one year.

PAETEC has a supervisory review process for compliance with rules for outbound marketing situations. Records are kept for a minimum of one year.

Annual certification of CPNI operational processes.

PAETEC has assigned an officer to monitor compliance with CPNI rules and certify such processes. PAETEC strives to ensure compliance with all FCC rules in the interests of its customers.